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KERANOS LLC AND
7 UNITED MODULE CORP.

8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN JOSE DIVISION
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12 SAMSUNG ELECTRONICS CO., LTD., and
13 SAMSUNG SEMICONDUCTOR, INC.,

14 Plaintiffs,

15 v.

16 UNITED MODULE CORP., and KERANOS,
17 LLC,

18 Defendants.

CASE NO.: CV-11-00430- LHK

**STIPULATED REQUEST FOR
ORDER EXPEDITING BRIEFING
AND HEARING SCHEDULE ON
DEFENDANTS' MOTIONS TO
DISMISS AND CASE
MANAGEMENT CONFERENCE
AND ORDER**

19 WHEREAS on February 1, 2011, defendants United Module Corp. ("United Module")
20 and Keranos, LLC ("Keranos") filed their Motions to Dismiss Pursuant to the First to File Rule
21 and/or for Lack of Subject Matter Jurisdiction ("Motion to Dismiss") in the above-referenced
22 action before Magistrate Judge Grewal, the Court to which this case was initially assigned;

23 WHEREAS by Order of February 2, 2011, Magistrate Judge Grewal referred this case to
24 Judge Lucy Koh with a request to consider whether this case should be related to the following
25 three declaratory judgment actions before Judge Koh entitled:

- 26 • *Microchip Tech., Inc. et. al. v. United Module Corp. et. al.*, Civil Action No. 3:10-
27 cv-4241-LHK ("the Microchip California Case") [Dkt. No. 3 at ¶¶ 6-7];
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- *Freescale Semiconductor, Inc. et al. v. United Module Corp. et al.*, Civil Action No. 10-cv-5196-LV (“Freescale California Case”) [Dkt. No. 3 at ¶¶ 7-8]; and
- *Taiwan Semiconductor Mfg. Co. et al. v. United Module Corp. et al.*, Civil Action No. 10-cv-5290-BZ (“the TSMC California Case”) [Dkt. No. 3 at ¶ 9] (collectively referred to herein as “Related Declaratory Judgment Actions”);

WHEREAS all the parties to this action agree that this action should be related with the Related Declaratory Judgment Actions; and

WHEREAS, Keranos and United Module have previously filed Motions to Dismiss Pursuant to the First to File Rule and/or for Lack of Subject Matter Jurisdiction in the Related Declaratory Judgment Actions that are currently set for hearing before Judge Koh on March 3, 2011, with opposition briefs due on February 4 and reply briefs due on February 11;

WHEREAS, the Joint Case Management Conference for the Related Declaratory Judgment Actions is also scheduled for March 3, 2011; and

WHEREAS, the parties to this action agree that the Motion to Dismiss filed on February 1, 2011 should be heard and considered by Judge Koh at the March 3 hearing;

Plaintiff Samsung and Defendants Keranos and United Module hereby agree and STIPULATE, pursuant to Civ. Local Rule 6-2, that the following briefing and hearing schedule shall be implemented:

- Friday, February 4: Plaintiffs in this action and the Related Declaratory Judgment Actions shall file their opposition to defendants’ Motions to Dismiss.
- Friday, February 11: Defendants in this action and the Related Declaratory Judgment Actions shall file their reply briefs in support of their motions to dismiss.
- Thursday, March 3: Hearing on the motions to dismiss in this action and the Related Declaratory Judgment Actions.
- Thursday, March 3: Case Management Conference for this action and the Related Declaratory Judgment Actions.

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Dated: February 3, 2011

AGILITY IP LAW

By: /s/ Monica Mucchetti Eno
Monica Mucchetti Eno

Attorneys for Defendants
KERANOS, LLC and UNITED MODULE
CORP.

Dated: February 3, 2011

KING & SPALDING LLP


By: /s/ Paul J. Andre
Paul J. Andre

Attorneys for Plaintiffs
SAMSUNG ELECTRONICS CO., LTD. and
SAMSUNG SEMICONDUCTOR, INC.

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PURSUANT TO STIPULATION, IT IS SO ORDERED

Dated: February 3, 2011



Judge Lucy H. Koh
Honorable Judge of the
United States District Court